

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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MARTIN J. WALSH,	)
SECRETARY OF LABOR,	)
UNITED STATES DEPARTMENT OF LABOR,	)
	)
Plaintiff,	)
	)
v.	) Civil Action No. 2:21-cv-1391
	)
INTRANATIONAL HOME CARE, LLC, AND	)
DILLI ADHIKARI	)
	)
Defendants.	)
	)

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**SECRETARY'S MOTION TO DISMISS DEFENDANTS' COUNTERCLAIM**

Plaintiff, the Secretary of Labor, U.S. Department of Labor, though his undersigned attorneys, files this motion to dismiss Defendants' Counterclaim for the reasons set forth in the accompanying memorandum.

WHEREFORE, the Secretary respectfully requests that this Motion be Granted.

Respectfully submitted,

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**UNITED STATES DEPARTMENT OF LABOR**

Seema Nanda  
Solicitor of Labor  
  
Oscar L. Hampton III  
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*/s/ Andrea Luby*  
By: Andrea Luby  
PA ID # 321609

Date: August 30, 2022September 1,  
2022

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Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I certify that on September 1, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will provide notice and an electronic link to this document to the following attorneys of record:

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By: Andrea Luby